UNITED STATES OF AMERICA   )
)
              v.   )
)   **STIPULATION OF**

Manning, Bradley E.   )   **EXPECTED TESTIMONY**
PFC, U.S. Army,   )
HHC, U.S. Army Garrison,   )   **SA David Shaver**
Joint Base Myer-Henderson Hall   )
Fort Myer, Virginia 22211   )   **16 August 2013**

It is hereby agreed by the Accused, Defense Counsel, and Trial Counsel, that if SA David Shaver were present to testify during the presentencing phase of this court-martial, he would testify substantially as follows:

1. Prosecution Exhibit (PE) 205 is an email that I pulled from the allocated space in the accused's personal Macintosh computer. The personal Macintosh was previously admitted as PE 11. The email was located in the sent folder of the Thunderbird email client. Thunderbird email client is the program which hosts emails from the accused's gmail and earthlink email accounts. The email is entitled "Happy Thanksgiving [Belated]," and the accused sent the email to Mr. Tyler Watkins on 28 November 2009.

2. PE 206 is a summary I created of numerous emails that I found in the allocated space of the accused's personal Macintosh computer. To locate the emails, I searched for "Danny Clark" or "Daniel Clark" in the accused's Thunderbird email client, both in the sent folder and the inbox folder. The filtered results showed all the emails between the accused and Mr. Clark and showed information in the following fields: "To," "From," "Cc," "Subject," "Sent," and "Received." I then took a screenshot of the search results, which is what you see in PE 206. I discovered that there were twenty-seven messages in the 23 August 2009 to 20 May 2010 timeframe. In the "From" and "To" lines, the email recipients are typically listed by name only. The names "Danny Clark" and "Daniel Clark" correspond to the email addresses "dclark@mit.edu," dclark@pobox.com," and "danny@opensysadmin.com." Bradley.manning@earthlink.net, Bradley Manning, Brad Manning, and Bradley, are all emails or names that correspond to emails of the accused.

3. PE 207 is a screenshot of a configuration file showing encryption contacts located in the allocated space of the personal Macintosh computer. Specifically, the file was located at the following path: "\Macintosh HD\Users\bmanning\Library\Application Support\Adium 2.0\Default\otr.fingerprints." Adium is the chat client that the accused used on his personal Macintosh computer. Off the Record (OTR) is an add-on to that chat client, which is used to encrypt chat communications while they are in transit. OTR requires both contacts or parties to share their encryption keys to enable chat communications. To complete this process, one party requests the initiation of encrypted conversation and the receiving party accepts the invitation. The parties then exchange unique encryption keys which serve as decoders to enable each computer receiving a message to translate the encrypted message into readable text. The screenshot reveals the individuals with whom the accused has shared encryption keys, which includes "danny@opensysadmin.com." As previously stated, the email address "danny@opensysadmin.com" corresponds to Mr. Danny Clark

4. PE 208 is a portion of a chat that I located and carved out of the unallocated space on the accused's personal Macintosh computer. I searched the unallocated space for deleted chats between Mr. Clark's email address "danny@opensysadmin.com" and the accused. I then formatted the results, so the information was easier to read. The portion of the chat that I located occurred on 18 March 2010 and was between "bradley.e.manning@gmail.com" ("alias=Bradley Manning") and "danny@opensysadmin.com" ("alias=Danny Clark").

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